

David M. Monachino (DM 1527)  
Eddy Salcedo (ES 3391)  
Seyfarth Shaw LLP  
620 Eighth Ave  
New York, New York 10018  
Tel: (212) 218-5500  
Fax: (212) 218-5526

and

David Frazee (CA Bar No. 195375) (admission *pro hac vice* pending)  
Jonmi N. Koo (CA Bar No. 231336) (admission *pro hac vice* pending)  
Perkins Coie LLP  
101 Jefferson Drive  
Menlo Park, California 94025-1114  
Tel: (650) 838-4300  
Fax: (650) 838-4350

*Attorneys for Plaintiffs*

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK

EASTWEST INTERNATIONAL (TAIWAN) :  
ENTERPRISES, a corporation formed under the :  
laws of Taiwan (ROC); and VICTORIA POINT :  
CORPORATION, a corporation formed under :  
the laws of the British Virgin Islands, :

Plaintiffs, :

-against- :

JOSEPH DELGRECO & COMPANY, INC., a :  
corporation formed under the laws of the State :  
of New York; and JOSEPH DELGRECO, an :  
individual, :

Defendants. :

Case No.: 08 CIV 6124

**NOTICE OF MOTION TO ADMIT**  
**COUNSEL PRO HAC VICE**

PLEASE TAKE NOTICE that, upon the accompanying Declaration of David Frazee in support of this motion, the Exhibit A annexed thereto; the Declaration of Jonmi N. Koo in support of this motion, the Exhibit A annexed thereto; the Declaration of Eddy Salcedo in support of this motion; and proposed Order Admitting Counsel *Pro Hac Vice*, and upon all the

prior pleadings and proceedings herein, Plaintiffs Eastwest International (Taiwan) Enterprises and Victoria Point Corporation will move this Court, at a date and time to be determined by the Court, before the Honorable Judge Deborah A. Batts, United States District Judge, pursuant to Rule 1.3(c) of the Local Civil Rules of the United States District Courts for the Southern and Eastern Districts of New York, for an Order allowing the *pro hac vice* admissions of David Frazee and Jonmi N. Koo, members of the firm Perkins Coie LLP, 101 Jefferson Drive, Menlo Park, California 94025, to represent plaintiffs, along with David M. Monachino and Eddy Salcedo from the New York office of Seyfarth Shaw LLP, in the above-captioned action in this Court.

Dated: New York, New York  
August 13, 2008

SEYFARTH SHAW LLP

By: 

David M. Monachino (DM 1527)  
Eddy Salcedo (ES 3391)  
Seyfarth Shaw LLP  
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New York, New York 10018  
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and

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(*admission pro hac vice pending*)  
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Perkins Coie LLP  
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*Attorneys for Plaintiffs*

TO: Cary Brian Samowitz, Esq.  
DLA Piper US LLP (NY)  
1251 Avenue of the Americas  
New York, NY 10020

David M. Monachino (DM 1527)  
Eddy Salcedo (ES 3391)  
Seyfarth Shaw LLP  
620 Eighth Ave  
New York, New York 10018  
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and

David Frazee (CA Bar No. 195375) (admission *pro hac vice* pending)  
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*Attorneys for Plaintiffs*

IN THE UNITED STATES DISTRICT COURT  
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Plaintiffs, :

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JOSEPH DELGRECO & COMPANY, INC., a :  
corporation formed under the laws of the State :  
of New York; and JOSEPH DELGRECO, an :  
individual, :

Defendants. :

Case No.: 08 CIV 6124

**ORDER**

This matter is before the Court on a Motion for Admission *Pro Hac Vice* pursuant to Rule 1.3(c) of the Local Civil Rules of the United States District Courts for the Southern and Eastern Districts of New York. Upon consideration of this motion and supporting papers, it is, this \_\_\_\_ day of August 2008,

ORDERED that the Motion for Admission *Pro Hac Vice* for David Frazee, Esq. and Jonmi N. Koo, Esq. is GRANTED; and it is

FURTHER ORDERED that David Frazee, Esq. and Jonmi N. Koo, Esq., are hereby admitted to appear before this Court as counsel for Plaintiffs in the above-captioned matter.

All attorneys appearing before this Court are subject to the Local Rules of this Court, including the Rules governing discipline of attorneys. If this action is assigned to the Electronic Case Filing (ECF) system, counsel shall immediately apply for an ECF password at [nysd.uscourts.gov](http://nysd.uscourts.gov). Counsel shall forward the *pro hac vice* fee to the Clerk of the Court.

SO ORDERED.

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JUDGE DEBORAH A. BATTS  
UNITED STATES DISTRICT JUDGE

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK

EASTWEST INTERNATIONAL (TAIWAN) :  
ENTERPRISES, a corporation formed under the :  
laws of Taiwan (ROC); and VICTORIA POINT : Case No.: 08 CIV 6124  
CORPORATION, a corporation formed under :  
the laws of the British Virgin Islands, :

Plaintiffs, :

-against- :

JOSEPH DELGRECO & COMPANY, INC., a :  
corporation formed under the laws of the State :  
of New York; and JOSEPH DELGRECO, an :  
individual, :

Defendants. :

**CERTIFICATE OF SERVICE**

EDDY SALCEDO, states under penalty of perjury:

I certify that on August 13, 2008, I caused to be served true and correct copies of the foregoing Notice of Motion to Admit Counsel *Pro Hac Vice*, Declaration of Eddy Salcedo, Esq. in Support, Declaration of David Frazee in Support, Declaration of Jonmi N. Koo in Support, and Proposed Order, enclosed in a post-paid envelope by U.S. first-class regular mail in an official depository under the exclusive care and custody of the United States Postal Service within the State of New York at the addresses listed below:

TO: **Cary Brian Samowitz**  
DLA Piper US LLP (NY)  
1251 Avenue of the Americas  
New York, NY 10020

Dated: New York, New York  
August 13, 2008



Eddy Salcedo

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK

EASTWEST INTERNATIONAL (TAIWAN) :  
ENTERPRISES, a corporation formed under the :  
laws of Taiwan (ROC); and VICTORIA POINT :  
CORPORATION, a corporation formed under :  
the laws of the British Virgin Islands, :

Case No.: 08 CIV 6124

ECF Case

Plaintiffs, :

-against- :

JOSEPH DELGRECO & COMPANY, INC., a :  
corporation formed under the laws of the State :  
of New York; and JOSEPH DELGRECO, an :  
individual, :

Defendants. :

**DECLARATION OF DAVID FRAZEE**  
**IN SUPPORT OF *PRO HAC VICE***  
**APPLICATION**

DAVID FRAZEE, states under penalty of perjury:

1. I am an attorney with the law firm of Perkins Coie LLP, counsel for plaintiffs in the above-captioned action, and a member in good standing of the Bar of the State of California. I submit this declaration in support of this motion for my *pro hac vice* admission to the United States District Court for the Southern District of New York in the above-captioned action.

2. I am not under suspension or disbarment by any Court, nor are there any pending disciplinary proceedings against me in any State or Federal Court.

3. I have reviewed the local rules governing the United States District Court for the Southern and Eastern Districts of New York and shall comply with all said rules.

4. Annexed hereto as Exhibit A is a certificate of good standing issued by the Supreme Court of the State of California within the past thirty (30) days stating that I am a member in good standing of the Bar.

WHEREFORE, I respectfully request that I be admitted *pro hac vice* to represent plaintiffs in the above-captioned action in this court.

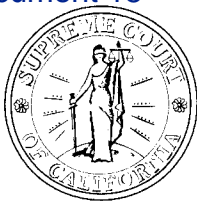
Dated: New York, New York  
August 13, 2008

By: \_\_\_\_\_

A handwritten signature in black ink, appearing to read 'David Frazee', is written over a horizontal line.

DAVID FRAZEE





# Supreme Court of California

FREDERICK K. OHLRICH

*Clerk of the Court*

## CERTIFICATE OF THE CLERK OF THE SUPREME COURT OF THE STATE OF CALIFORNIA

**DAVID IKE FRAZEE**

*I, FREDERICK K. OHLRICH, Clerk of the Supreme Court of the State of California, do hereby certify that **DAVID IKE FRAZEE** was on the 4th day of June 1998, duly admitted to practice as an attorney and counselor at law in all the courts of this state; and that his name now appears on the Roll of Attorneys as a member of the bar of this state in good standing.*

*Witness my hand and the seal of the court,  
this 6th day of August, 2008.*

**FREDERICK K. OHLRICH**

*Clerk of the Supreme Court*

By

A handwritten signature in cursive script, appearing to read "Joseph Cornetta", written over a horizontal line.

*Joseph Cornetta, Deputy Clerk*

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK

EASTWEST INTERNATIONAL (TAIWAN) :  
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individual, :

Defendants. :

Case No.: 08 CIV 6124

ECF Case

**DECLARATION OF JONMI N. KOO**  
**IN SUPPORT OF *PRO HAC VICE***  
**APPLICATION**

JONMI N. KOO, states under penalty of perjury:

1. I am an attorney with the law firm of Perkins Coie LLP, counsel for plaintiffs in the above-captioned action, and a member in good standing of the Bar of the State of California. I submit this declaration in support of this motion for my *pro hac vice* admission to the United States District Court for the Southern District of New York in the above-captioned action.

2. I am not under suspension or disbarment by any Court, nor are there any pending disciplinary proceedings against me in any State or Federal Court.

3. I have reviewed the local rules governing the United States District Court for the Southern and Eastern Districts of New York and shall comply with all said rules.

4. Annexed hereto as Exhibit A is a certificate of good standing issued by the Supreme Court of the State of California within the past thirty (30) days stating that I am a member in good standing of the Bar.

WHEREFORE, I respectfully request that I be admitted *pro hac vice* to represent plaintiffs in the above-captioned action in this court.

Dated: San Francisco, California  
August 13, 2008

By:   
JONMIN N. KOO



## Supreme Court of California

FREDERICK K. OHLRICH

*Clerk of the Court*

### CERTIFICATE OF THE CLERK OF THE SUPREME COURT

OF THE

STATE OF CALIFORNIA

**JONMI NAI ON KOO**

*I, FREDERICK K. OHLRICH, Clerk of the Supreme Court of the State of California, do hereby certify that **JONMI NAI ON KOO** was on the 1st day of December 2004, duly admitted to practice as an attorney and counselor at law in all the courts of this state; and that his/her name now appears on the Roll of Attorneys as a member of the bar of this state in good standing.*

*Witness my hand and the seal of the court,  
this 6th day of August, 2008.*

**FREDERICK K. OHLRICH**

*Clerk of the Supreme Court*

By

A handwritten signature in cursive script, appearing to read "Joseph Cornetta", written over a horizontal line.

*Joseph Cornetta, Deputy Clerk*

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK

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Defendants. :

Case No.: 08 CIV 6124

**DECLARATION OF  
EDDY SALCEDO, ESQ. IN SUPPORT  
OF PRO HAC VICE ADMISSION**

EDDY SALCEDO, states under penalty of perjury:

1. I am a member of the Bar of the State of New York and the Bar of this Court, and an Associate with the law firm of Seyfarth Shaw LLP, maintaining an office at 620 Eighth Avenue, New York, New York, 10018. I respectfully submit this affirmation in support of plaintiffs' application to admit David Frazee and Jonmi N. Koo *pro hac vice* to represent plaintiffs in the above-captioned action in this Court.

2. Mr. Frazee and Ms. Koo are attorneys with Perkins Coie LLP, located at 101 Jefferson Drive, Menlo Park, California 94025-1114. As set forth in their respective declarations in support of this motion, plaintiffs have expressly requested that Mr. Frazee and Ms. Koo represent them in this matter.

3. As set forth in his declaration in support of this motion, Mr. Frazee is a member in good standing of the Bar of the State of California and is of high moral character.

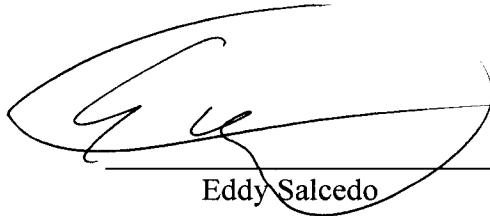
4. As set forth in her declaration in support of this motion, Ms. Koo is a member in good standing of the Bar of the State of California and is of high moral character.

5. Neither Mr. Frazee or Ms. Koo have been suspended or disbarred by any court, and there are no disciplinary proceedings pending against them in any state or federal court.

6. Mr. Frazee and Ms. Koo are familiar with and have reviewed all rules governing the United States District Court for the Southern District of New York and have sworn to comply with those rules, including the Local Rules of Practice for the United States District Court for the Southern District of New York, the Civility Principles of the United States District Court for the Southern District of New York and the New York State Lawyer's Code of Professional Responsibility.

WHEREFORE, Plaintiffs EastWest International (Taiwan) Enterprises and Victoria Point Corporation respectfully request that this Court enter the proposed Order submitted herewith approving the admission *pro hac vice* of David Frazee and Jonmi N. Koo.

Dated: New York, New York  
August 13, 2008



Eddy Salcedo